

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

In Re:

Rumford Energy, LLC

Debtor

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Chapter 7

Case No. 07-11011-JMD

Hearing Date: June 6, 2007

Hearing Time: 10:00 a.m.

MOTION OF DEBTOR TO EXTEND DEADLINE TO FILE SCHEDULES

Rumford Energy, LLC, by its attorneys, Donchess & Notinger, PC, moves pursuant to Federal Bankruptcy Rule 1007(c) to extend the deadline for the Debtor to file its schedules and associated documents for approximately 15 days, until June 15, 2007, as follows:

1. Rumford Energy, LLC ("Rumford"), a small family business, operated an oil delivery and HVAC business in the Concord, New Hampshire area. Rumford ceased operations on April 13, and subsequently filed a Chapter 7 petition a few weeks later on May 16, 2007.

2. Rumford has a substantial number of pre-paid oil customers for both 2006 and 2007. Rumford has hundreds if not a thousand customers. Rumford believes it has insufficient assets on hand to repay these customers in full. Rumford does have a secured lender, Ocean National Bank, but the secured debt to the lender is believed to be less than \$50,000 at this time, based upon discussions with the lender. The lender has a blanket lien in all the assets of Rumford, except for certain vehicles which are unencumbered. There are also additional vehicles which are encumbered by purchase money liens to unrelated lenders. The lender's collateral generally consists of receivables, equipment and inventory.

There may be equity in the lender's collateral. There are also issues with credit card chargebacks by customers who paid by credit card.

3. Rumford determined that the only way to achieve orderly liquidation of its assets was to file Chapter 7.

4. Rumford was in the process of preparing the paperwork for filing Chapter 7 (which involved typing in by hand over 1000 customer names), when the State of New Hampshire, without notice to Rumford, obtained a warrant and seized Rumford's business records. In addition, prior to the filing, Rumford's lender seized two trucks in which the lender had a lien. Rumford allowed the lender to liquidate the vehicles prior to filing to reduce the lender's secured claim, as the lender had a buyer for the trucks.

5. Rumford cannot fully complete its bankruptcy schedules without access to its business records.

6. Rumford's counsel contacted the Attorney General's Office, and the Attorney General's office requested that Rumford send the office a list of what is needed to complete the schedules.

7. Rumford is in the process of preparing a list of records to send to the State so that it can complete the schedules. Rumford is hopeful this procedure will work quickly.

8. As soon as the case was filed, Rumford's counsel contacted the Trustee, Bruce Harwood, to describe the situation and to turnover the assets in Rumford's possession to the Trustee. Rumford has turned over such assets to the Trustee and/or made arrangements that are satisfactory to the Trustee at this time.

9. Under the circumstances, which are beyond the control of Rumford, Rumford believes

there is cause to extend the deadline to file full schedules until June 15, 2007. Rumford will file schedules as soon as possible upon receipt of the information necessary to prepare such schedules, and hopes to do so in advance of June 15, 2007.

10. The creditors meeting is scheduled for June 22, 2007.

11. The Trustee consents to an extension of the deadline, but the Trustee has not seen this motion.

WHEREFORE, Rumford Energy, LLC requests this Court:

- A. Extend the deadline for Rumford Energy, LLC to file schedules until June 15, 2007;
and
- B. Grant such other and further relief as this Court deems just and equitable.

Respectfully submitted,

Rumford Energy, LLC
By and Through Its Attorneys,
Donchess & Notinger, P.C.

Dated: May 25, 2007

/s/ Steven M. Notinger
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